UNITED	STA	TES	DISTRICT	COURT				
DISTR	ICT	OF	MASSACHUS	ETTS	:	 . »,	П	-9

UNITED STATES OF AMERICA)

CRIMINAL NO. 04-10288 RWZ

V.)

JOSE MELO)

DEFENDANT JOSE MELO'S MOTION TO REVOKE DETENTION ORDER AND FOR RELEASE FROM CUSTODY

Jose Melo, defendant in the above-captioned matter moves this Court, pursuant to 18 U.S.C. §3145(b) to revoke the order of detention set by the Court (Swartwood, M.J.) on July 12, 2004. As grounds therefore, Jose Melo states:

- 1. That his criminal record is unremarkable;
- That pre-trial services recommended the defendant be released pending trial;
- 3. That the charges against Mr. Melo are less egregious than originally believed, and;
- 4. That there are conditions that would reasonably assure the appearance of Mr. Melo and the safety of the community.

In support of this motion the defendant has filed a supporting memorandum of law.

Jose Melo, By his attorney,

Stephen Neyman 160 State Street 8th Floor Boston, MA 02109-2502 617-263-6800 B.B.O. # 551576